

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re:)	
)	
Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996)))))	Docket No. 03-00119

**ITC^DELTACOM COMMUNICATION INC.'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom ("ITC^DeltaCom") hereby serves upon BellSouth Telecommunications, Inc. ("BellSouth") the following written request for production of documents to be answered under oath by an officer or agent of BellSouth on or before July 2, 2003.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards,

microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

3. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

4. "You" or "yours" means BellSouth and any agents or employees thereof.

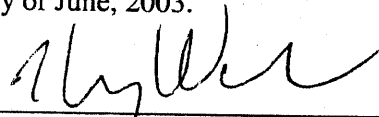
5. When providing information regarding cost studies in response to documents identified in Interrogatories or to these document requests, please provide all supporting information and workpapers for such cost study data. Also please provide all such cost studies and supporting data in machine-readable electronic form with functional electronic files. Cost study data must be Tennessee specific.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce any documents that are identified in response to ITC^DeltaCom's First Set of Interrogatories, as well as any documents which are specifically requested in such Interrogatories.
2. Provide any contracts or agreements between BellSouth and its vendors and between BellSouth and other carriers that provides a limit on backbilling of charges.
3. Produce any cost studies, papers, or business analysis that were completed as part of BellSouth's development of its market rates. (See Instructions above.)

4. Produce any emails, correspondence, or memos that discuss or relate to the development or establishment of the market rates.
5. Provide BellSouth's instructions and ordering forms for ordering new combinations of loop and transport (also known as EELs).
6. Provide BellSouth's instructions and ordering forms for converting a special access circuit to a combination of loop and transport (also known as an EEL).
7. Provide any emails, memos, correspondence, or other documents regarding BellSouth's consideration and execution of the "reverse" collocation agreement with ITC^DeltaCom.
8. Produce any license agreements, contracts or interconnection agreements that BellSouth has with other CLECs/ILECs where BellSouth collocates in the CLEC or ILEC space.
9. Produce any guidelines or instructions to CLECs as to the information required to report troubles to BellSouth.

Respectfully submitted this 12th day of June, 2003.



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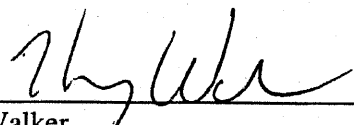
Attorneys for ITC^DeltaCom Communications, Inc.

CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served by United States mail a copy of the within and foregoing, **ITC^DELTACOM COMMUNICATIONS, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH** upon the following person, properly addressed as follows:

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

This 12th day of June, 2003.



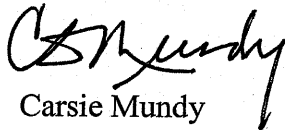
Henry Walker

June 24, 2003

Re: Docket 03-00119

Sharla Dillon:

Joe Werner, the Pre-Arbitration Officer requested that this be placed in the docket file.


Carsie Mundy

RECEIVED

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T.R.A. DISCRET ROOM